

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

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**BRANDON CALLIER,**

**Plaintiff,**

**v.**

**REPTAR MARKETING LLC**, a Florida Limited  
Liability Company and **RONALD LIDDELL**

**Defendant.**

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**EP-23-cv-00265-KC**

**PLAINTIFF’S MOTION FOR SUBSTITUTE SERVICE OF PROCESS**

Plaintiff hereby requests to leave to serve Defendants REPTAR MARKETING, LLC’ (“Reptar”) and RONALD LIDDELL (“Liddell”) via alternative means. Plaintiff hired a process server to serve Defendants Reptar and Liddell at the only known address for each Defendant. However, Defendants are not servable via traditional means.

Plaintiff filed his Original Complaint on July 14, 2023. In September 2023, Plaintiff was contacted by representatives of Follow My Lead Marketing and informed that the phone calls were actually made by Reptar Marketing LLC. On September 11, 2023, Plaintiff filed an unopposed motion to amend his Complaint. On September 12, 2023, the Court granted Plaintiff’s Motion.

On September 20, 2023, Plaintiff hired JMT Management Corp to serve Defendants Reptar and Liddell at 335 E. Linton Boulevard, #1962, Delray Beach, Florida. This is the only address listed for Reptar and Liddell at Sunbiz.org. Exhibit A. Sunbiz.org is the website maintained by the Florida Secretary of State for business records of companies located in Florida.

On September 21, 2023, Plaintiff received an affidavit of non-service from JMT Boulevard regarding the attempted service of Reptar and Liddell. Exhibit B. JMT’s affidavit explained that

the given address is a United States Post Office box and that “Ronald Liddell and Reptar Marketing, LLC no longer has an active mailbox. There is no forwarding address that was left.” Exhibit B.

On September 26, 2023, Plaintiff did a public records search on LexisNexis and found an email address and phone number for Liddell. Exhibit C. As part of his investigation, Plaintiff used an assumed name, “Thomas Joyner,” and pretended to be a business seeking telemarketing services. Plaintiff sent an email to [Ronald.A.Liddell@gmail.com](mailto:Ronald.A.Liddell@gmail.com) pretending to be interested in hiring Defendant Reptar as a telemarketer. Exhibit D. Plaintiff sent the email in order to verify [Ronald.A.Liddell@gmail.com](mailto:Ronald.A.Liddell@gmail.com) was indeed a good email address to contact Defendant Liddell. Approximately 15 minutes after the email Plaintiff received a phone call from phone number 407-223-9067. Exhibit E. Plaintiff answered the phone call and it was Defendant Liddell on the other end of the phone call.

Defendant Liddell introduced himself and said he was the owner of Reptar Marketing. Liddell went on to tell Plaintiff how his business worked and solicited Plaintiff to join Reptar Marketing. During the course of the conversation, Defendant Liddell informed Plaintiff that he would be receiving an email from Susan Cordero with all of the information on how to sign up. Plaintiff then received an email from Reptar Marketing and Susan Codero from the email address [reptarmarketing01@gmail.com](mailto:reptarmarketing01@gmail.com). Exhibit F. The phone calls and emails confirmed that the email addresses [Ronald.A.Liddell@gmail.com](mailto:Ronald.A.Liddell@gmail.com) and [reptarmarketing01@gmail.com](mailto:reptarmarketing01@gmail.com) are indeed good email addresses for Ronald Liddell and Reptar Marketing LLC.

Plaintiff continued the phone call with Defendant Liddell. During the phone call, Defendant Liddell informed Plaintiff that he had been in Europe for the past two months. Plaintiff then asked Defendant Liddell where he currently lives. Defendant Liddell informed Plaintiff that

he lives full-time in Panama and has done so for the past two years. Liddell also informed Plaintiff that his Reptar Marketing call center operations are also in Panama.

Defendant Liddell is the registered agent of Defendant Reptar. Defendant Reptar does not have an actual physical presence in the United States. The only address on file for Defendant Reptar is a PO Box. However, that PO Box is not currently active. Defendant Liddell is also the only listed officer, director, or manager of Defendant Reptar. Therefore, Liddell and Reptar do not have physical addresses where they can be served in the United States.

Defendant Liddell and Defendant Reptar are not physically servable in the United States. Plaintiff requests that the Court allow Plaintiff to serve Defendant Liddell by email at [Ronald.A.Liddell@gmail.com](mailto:Ronald.A.Liddell@gmail.com) with a read receipt activated for the email. Plaintiff requests that the Court allow Plaintiff to serve Defendant Reptar by email at [Ronald.A.Liddell@gmail.com](mailto:Ronald.A.Liddell@gmail.com) and [reptarmarketing01@gmail.com](mailto:reptarmarketing01@gmail.com). Additionally, Plaintiff asks the Court to allow Plaintiff to serve the Florida Secretary of State with a physical copy of the Complaint, Summons, and two acceptance letters at Reptar Marketing, LLC, c/o Secretary of State, P.O. Box 6327, Tallahassee, Florida 32314.

Dated: September 29, 2023

Respectfully,

A handwritten signature in blue ink, appearing to read 'B. Callier', is written over a horizontal line.

/s/ Brandon Callier

Brandon Callier

Plaintiff, Pro Se

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